

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE LAW FIRM OF HUGH H. MO, P.C.,

Plaintiff,

Case No.: 1:20-cv-07077-AKH

v.

NG LAP SENG ALSO KNOWN AS DAVID NG,

Defendant.

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NG LAP SENG ALSO KNOWN AS DAVID NG,

Third-Party Plaintiff,

v.

HUGH H. MO,

Third-Party Defendant.

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NG LAP SENG ALSO KNOWN AS DAVID NG,

Counterclaim Plaintiff,

v.

THE LAW FIRM OF HUGH H. MO, P.C.,

Counterclaim Defendant.

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**DECLARATION OF SARI E. KOLATCH**

I, Sari E. Kolatch, hereby declare the following pursuant to 28 U.S.C. §1746:

1. I am a member of Cohen Tauber Spievack & Wagner P.C., counsel to Defendant and Counterclaim/Third-party Plaintiff Ng Lap Seng (“Ng”). I submit this declaration in support of Ng’s motion for leave to take third party depositions.

2. Attached as Exhibit 1 are excerpts from the deposition transcript of Hugh H. Mo, dated March 18, 2021.

3. Attached as Exhibit 2 is a retainer agreement, dated October 29, 2015, between Brafman & Associates, P.C. and Ng Lap Seng.

4. Attached as Exhibit 3 is an engagement letter, dated October 8, 2015, between the Law Firm of Hugh H. Mo, P.C. (the “Mo Firm”) and Ng.

5. Attached as Exhibit 4 is a note handwritten in Chinese by Ng, with a typed English translation, dated October 6 and 7.

6. Attached as Exhibit 5 is a supplemental engagement letter, dated November 1, 2015, between the Mo Firm and Ng.

7. Attached as Exhibit 6 is a letter of engagement letter between Park Jensen Bennet LLP (“PJB”) and the Mo Firm in the matter of *United States v. Ng Lap Seng, et. al.*, No. 15 Cr. 706, (the Criminal Matter) dated April 19, 2016.

8. Attached as Exhibit 7 is a letter of engagement between Shapiro Arato LLP and the Mo Firm in the Criminal Matter, dated June 20, 2016.

9. Attached as Exhibit 8 is a letter of engagement between Sills Cummis & Gross and the Mo Firm in the Criminal Matter, dated July 1, 2016.

10. Attached as Exhibit 9 is a copy of the docket from the Criminal Matter.

11. Attached as Exhibit 10 is a supplemental letter of engagement between PJB and the Mo Firm dated April 10, 2017.

12. Attached as Exhibit 11 is an email from PJB partner Tai Park (“Park”), dated July 18, 2016, regarding a schedule for motions.

13. Attached as Exhibit 12 is a letter from Park to Daniel Gitner, dated March 23, 2017.

14. Attached as Exhibit 13 is an email from PJB associated Christopher Greer (“Greer”) to Hugh H. Mo (“Mo”), dated April 26, 2016 re: Ng Lap Seng – Meeting with Jacob Kaplan.

15. Attached as Exhibit 14 is an email, dated July 5, 2016, from Greer to Mo attaching a “high level summary and players list” to be distributed to the document reviewers.

16. Attached as Exhibit 15 is an email, dated July 1, 2016, from Greer to Mo and Park regarding search terms.

17. Attached as Exhibit 16 is email correspondence between Park and Mo, dated August 11, 2016.

18. Attached as Exhibit 17 is an email, dated May 15, 2017, from Park to Dan O’Neill at Shapiro Arato.

19. Attached as Exhibit 18 is a schedule of attorney escrow account payments between October 2015 and November 2018.

20. Attached as Exhibit 19 is an email from Mo, dated September 13, 2017, regarding Shapiro Arato August invoice.

21. Attached as Exhibit 20 is Ng’s Amended Answer, Counterclaim and Third-Party Claim in this action.

22. In response to a subpoena served by Ng in this action, PJB produced 80 pages of timesheets from its representation of Ng in the criminal matter.

Dated: May 21, 2021

  
Sari E. Kolatch